

HAFETZ NECHELES & ROCCO

ATTORNEYS AT LAW

500 FIFTH AVENUE
NEW YORK, N.Y. 10110
TELEPHONE: (212) 997-7595
TELECOPIER: (212) 997-7646
E-MAIL: INFO@HNRLAWOFFICES.COM

March 5, 2012

VIA EMAIL AND ECF

Carolyn Pokorny, Esq.
Roger Burlingame, Esq.
Todd Kaminsky, Esq.
United States Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Pedro Espada, Jr., et al.*, 10-CR-985 (FB)

Dear Counsel:

We have not yet received copies of the following exhibits that were included in the government's March 1, 2012 exhibit list:

GX	Description
61	Yonkers Raceway Records
128	HSBC Soundview Records
152	CEDC Amex Records
245	SME Articles of Incorporation
251	501(c)(3) regulations
272	Board of pharmacy photos (TBD)
302	Outside bids that Soundview provided to HRSA
303	45 C.F.R. Section 74.43
304	Bronen's Music Quickreport
351	Hurley's copy of Pedro and Connie Espada's 2005 tax return
352	CEDC's balance sheet as of June 30, 2005
404	April 16, 2010 print-out of email with writing

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GX	Description
405	Sylvan Learning Center account history - John Miranda
406	Sylvan Learning Center account history - John Miranda
407	Home repairs notes and records

Additionally the following documents are not legible:

GX	Description
9	Receipts (City Windows)
30	2008 Amex Verification Chart
49	2009 Pedro Espada receipts submitted for reimbursement
82	Receipts
99	Citibank Records - Connie and Pedro Espada, Jr. (complete)
124	Mercedes records
134(a)	5/3 1PM phone receipt
134(b)	Phone receipt
155	CEDC accounting ledger, and Pedro Gautier Espada exemplar
216(a)	original \$3,000 check, copy of which is found in 216 and marked "Q-214-2."
238	2003 CEDC tax return
354	Bentley receipt

Please tell us when you intend to produce these documents.

Very truly yours,

By: /s/Susan R. Necheles
 Susan R. Necheles
 Hafetz Necheles & Rocco
 500 Fifth Avenue, 29th Floor
 New York, NY 10110
 Telephone: (212) 997-7595
 Facsimile: (212) 997-7646
Attorney for Pedro Espada Jr.

/s/ Russell Gioiella
 Russell Gioiella
 Litman Asche & Gioiella
 140 Broadway
 New York, NY 10005
 Telephone: (212) 809-4500
 Facsimile: (646) 607-9643
Attorney for Pedro Gautier Espada